

MELINDA L. HAAG, CSBN 132612  
 United States Attorney  
 DEBORAH L. STACHEL, CSBN 230138  
 Acting Regional Chief Counsel, Region IX  
 Social Security Administration  
 CAROLYN B. CHEN, CSBN 256628  
 Special Assistant United States Attorney

160 Spear Street, Suite 800  
 San Francisco, California 94105  
 Telephone: (415) 977-8956  
 Facsimile: (415) 744-0134  
 E-Mail: Carolyn.Chen@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

PHILLIP MAYS,	)	CIVIL ACTION NO. 3:15-CV-02731-MEJ
Plaintiff,	)	
	)	
v.	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	FOR A FIRST EXTENSION FOR DEFENDANT
CAROLYN W. COLVIN, Acting	)	TO FILE CROSS-MOTION FOR SUMMARY
Commissioner of Social Security,	)	JUDGMENT
Defendant.	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have a first extension of time of 65 days to file her cross-motion for summary judgment and opposition to Plaintiff's motion. The current due date is December 14, 2015. The new due date will be February 17, 2016.

This is the first continuance sought by Defendant. There is good cause for this request. Defendant is seeking this extension due to Defendant's counsel's heavy workload in the last month and continuing heavy workload in the next two months, including her regular district court caseload, a hearing for an Equal Employment Opportunity Commission (EEOC) case on December 4, 2015 with follow-up briefing; two other pending EEOC matters that require discovery, including depositions in the next few weeks, and briefing; two Ninth Circuit briefs due in December 2015 and January 2016; and a Ninth Circuit appellate oral argument in early

1 February 2016.

2 Because of the factors described above, defense counsel is requesting additional time up  
3 to February 17, 2016, to fully review the administrative record and research the issues presented  
4 by Plaintiff's memorandum in support of Plaintiff's motion for summary judgment. Defendant  
5 apologizes for any inconvenience caused by the delay in the filing of Defendant's response to  
6 Plaintiff's motion for summary judgment.

7  
8 Respectfully submitted,  
HOMELESS ACTION CENTER

9 Dated: December 9, 2015

10 /s/ Nancy McGee  
(as authorized via e-mail on 12/9/2015)  
11 Nancy McGee  
12 Attorneys for Plaintiff

13 MELINDA L. HAAG  
United States Attorney

14 Dated: December 9, 2015

15 By s/ Carolyn B. Chen  
CAROLYN B. CHEN  
16 Special Assistant U.S. Attorney

17 Attorneys for Defendant

18 Defendant shall also file her Separate Statement of the Admin.  
19 Record by 2/17/06. Plaintiff's Reply and Reply Statement of Facts  
20 are due 3/2/06.

21 O

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 DATED: December 10, 2015

24   
25 HON. MARIA ELENA JAMES  
26 UNITED STATE MAGISTRATE JUDGE  
27  
28